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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

DARRELL DANIEL,  
  
Defendant.

CASE NO. 2:24-cr-00261-JAM

**SECOND STIPULATION AND ORDER TO  
CONTINUE STATUS CONFERENCE AND  
EXCLUDE TIME**

DATE: March 11, 2025

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and  
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By prior order, this matter is currently set for a status conference on March  
11, 2025.

2. By this stipulation, defendant now moves to continue the status conference  
until **June 03, 2025, at 09:00 a.m.**, and to exclude time between March 11, 2025, and  
June 03, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the  
following:

a) The government has represented that the discovery associated with  
this case includes law enforcement reports, photographs, audio recordings, and

1 search warrants related to a years-long investigation of criminal conduct that  
2 spanned five years. All of this discovery has been either produced directly to  
3 counsel and/or made available for inspection and copying.

4 b) On February 28 and March 3, 2025, the parties conferred regarding  
5 the status of the case.

6 c) Counsel for defendant desires additional time review the discovery,  
7 conduct defense investigation, consult with her client, discuss potential resolution of  
8 the matter, and otherwise prepare for trial.

9 d) Counsel for defendant believes that failure to grant the above-  
10 requested continuance would deny her the reasonable time necessary for effective  
11 preparation, taking into account the exercise of due diligence.

12 e) The government does not object to the continuance.

13 f) Based on the above-stated findings, the ends of justice served by  
14 continuing the case as requested outweigh the interest of the public and the  
15 defendant in a trial within the original date prescribed by the Speedy Trial Act.

16 g) For the purpose of computing time under the Speedy Trial Act, 18  
17 U.S.C. § 3161, et seq., within which trial must commence, the time period of March  
18 11, 2025 to June 03, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §  
19 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted  
20 by the Court at defendant's request on the basis of the Court's finding that the ends  
21 of justice served by taking such action outweigh the best interest of the public and  
22 the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 3, 2025

MICHELE BECKWITH  
Acting United States Attorney

/s/ JUSTIN L. LEE  
JUSTIN L. LEE  
Assistant United States Attorney

Dated: March 3, 2025

/s/ MIA CRAGER  
MIA CRAGER  
Counsel for Defendant  
DARRELL DANIEL

## ORDER

IT IS SO ORDERED.

Dated: March 03, 2025

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE